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May 1, 2006

BY HAND DELIVERY

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
236 Massachusetts Avenue, N.E.  
Suite 110  
Washington, DC 20002

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MAY - 1 2006  
Federal Communications Commission  
Office of Secretary

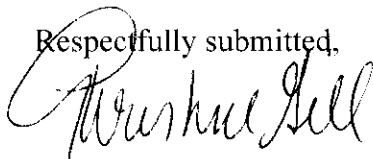
Re: Southern Communications Services, Inc. d/b/a SouthernLINC Wireless: E911 Phase II  
Quarterly Status Report; CC Docket No. 94-102

Dear Ms. Dortch:

Southern Communications Services, Inc. d/b/a SouthernLINC Wireless (SouthernLINC Wireless"), through its undersigned counsel, today submitted under separate cover its E911 Phase II Quarterly Status Report pursuant to the Commission's Order of November 3, 2005, granting in part SouthernLINC Wireless' Request for Waiver of Section 20.18(g)(1)(v) of the Commission's Rules, 47 C.F.R. § 20.18(g)(1)(v). SouthernLINC Wireless requested confidential treatment of these materials, incorporating by reference its Request for Confidentiality filed with the Commission on July 26, 2005 in conjunction with its initial Request for Waiver.

Enclosed please find an original and four copies of the redacted public version of the above-captioned E911 Phase II Quarterly Status Report. Please date-stamp the enclosed extra copy and return it in the envelope provided. If you have any questions regarding this filing, please do not hesitate to contact the undersigned.

Respectfully submitted,



Christine M. Gill

Enclosure

202.756.8283 044  
LSIABODE

REDACTED – FOR PUBLIC INSPECTION  
**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

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Federal Communications Commission  
Office of Secretary

In the Matter of	)	
	)	
Revision of the Commission's Rules To	)	
Ensure Compatibility with Enhanced 911	)	CC Docket No. 94-102
Emergency Calling Systems	)	
	)	
Request for Waiver By Southern	)	
Communications Services d/b/a	)	
SouthernLINC Wireless	)	

To: The Commission

**SOUTHERNLINC WIRELESS E911 PHASE II QUARTERLY REPORT:**

**MAY 1, 2006**

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Dated: May 1, 2006

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Request for Waiver By Southern	)	
Communications Services d/b/a	)	
SouthernLINC Wireless	)	

To: The Commission

**SOUTHERNLINC WIRELESS E911 PHASE II QUARTERLY REPORT:  
MAY 1, 2006**

Pursuant to the *Order* of the Federal Communications Commission ("FCC" or "Commission") of November 3, 2005,<sup>1</sup> Southern Communications Services, Inc. d/b/a SouthernLINC Wireless ("SouthernLINC Wireless") hereby provides the Commission its quarterly report regarding the status of its efforts to achieve ninety-five percent penetration of automatic location identification (ALI)-capable handsets among its subscribers pursuant to Section 20.18(g)(1)(v) of the Commission's Rules, 47 C.F.R. § 20.18(g)(1)(v). SouthernLINC Wireless notes that it filed a Petition for Reconsideration and Clarification of the *Order* on December 5, 2005, which is still pending before the

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<sup>1</sup> / *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Request for Waiver by Southern Communications Services, Inc. d/b/a SouthernLINC Wireless*, CC Docket No. 94-102, Order, FCC 05-188 (rel. Nov. 3, 2005) ("*Order*") (granting SouthernLINC Wireless until November 3, 2006, to achieve ninety-five percent penetration of location-capable handsets among its subscriber base and requiring the filing of quarterly status reports).

Commission, and clarifies that this quarterly status report is submitted separate from and without prejudice to its pending Petition.<sup>2</sup>

## **I. BACKGROUND**

On July 26, 2005, SouthernLINC Wireless, a “qualified Tier III carrier” as that term is defined in Section 107 of the *ENHANCE 911 Act*,<sup>3</sup> submitted a Request for Waiver requesting a limited extension of the Commission’s December 31, 2005, handset deployment deadline to allow SouthernLINC Wireless an additional twenty-four months to achieve ninety-five percent penetration of location-capable handsets among its subscriber base.<sup>4</sup> As set forth in the Request for Waiver and subsequent filings, SouthernLINC Wireless faces numerous challenges in its efforts to achieve the required level of penetration of location-capable handsets, including (i) a latent software defect in the Motorola A-GPS-equipped handsets used by SouthernLINC Wireless subscribers that rendered all A-GPS services in these handsets unusable for E911 location in July 2004; (ii) the substantial portion of handsets assigned to enterprise or government accounts that typically have long-term equipment replacement cycles and are both reluctant and resistant to upgrading from their current handsets to new location-capable handsets; and (iii) the number of SouthernLINC Wireless subscribers who utilize and rely on the range and coverage of higher-power 1 watt and 3 watt phones and who are unwilling to upgrade to a lower-power (0.6 watt) location-capable handset, which could decrease their ability

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<sup>2</sup> / Petition for Reconsideration and Clarification of SouthernLINC Wireless, CC Docket No. 94-102, filed December 5, 2005 (“Petition”).

<sup>3</sup> / National Telecommunications and Information Administration Organization Act – Amendment, Publ. L. No. 108-494, 118 Stat. 3986 (1994) (“*ENHANCE 911 Act*”).

<sup>4</sup> / Request for Waiver by SouthernLINC Wireless, CC Docket No. 94-102, filed July 26, 2005 (“Request for Waiver”).

to receive any communications services – including emergency services – in remote areas.<sup>5</sup>

On November 3, 2005, the Commission released its *Order* granting SouthernLINC Wireless a limited ten-month extension of the ninety-five percent handset penetration deadline and requiring SouthernLINC Wireless to file status reports on a quarterly basis. On December 5, 2005, SouthernLINC Wireless filed a Petition for Reconsideration and Clarification of the *Order*. This Petition is still pending before the Commission.

## **II. INFORMATION REGARDING THE STATUS OF SOUTHERNLINC WIRELESS' E911 PHASE II DEPLOYMENT EFFORTS**

In accordance with the *Order*,<sup>6</sup> SouthernLINC Wireless provides the Commission with the following information regarding its E911 Phase II deployment status and efforts.

### **A. Number and Status of Phase II Requests from PSAPs**

As of the date of this report, SouthernLINC Wireless had received 86 requests for Phase II service out of a total of 298 PSAPs in its service territory. SouthernLINC Wireless has completed deployment in response to 82 of these requests, with 4 requests still pending. Those pending requests are scheduled for deployment within the May-June 2006 time-frame, well in advance of the six month deployment deadline. At this time, SouthernLINC Wireless does not anticipate any delays in deployment. A chart

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<sup>5</sup> / See, e.g., Request for Waiver at 2 – 3; See also SouthernLINC Wireless Notice of *Ex Parte* Presentation, CC Docket No. 94-102, filed September 9, 2005; SouthernLINC Wireless Response to Request for Additional Information Supporting its Request for Waiver of the E911 Phase II Handset Deployment Deadline, CC Docket No. 94-102, filed Oct. 26, 2005 (“Supplemental Filing”).

<sup>6</sup> / *Order* at ¶ 23.

summarizing SouthernLINC Wireless' deployment of E911 Phase I and Phase II service to PSAPs is provided as Attachment A.

Pending Phase II requests are detailed in the chart enclosed as Attachment B. Because SouthernLINC Wireless has chosen to deploy a handset-based solution to provide caller location data to PSAPs, it is currently capable of providing E911 Phase II service to any and all Phase II-capable PSAPs in its service territory.

**B. Estimated Dates on Which Phase II Service Will Be Available to PSAPs Served by SouthernLINC Wireless' Network**

As described above, SouthernLINC Wireless is capable of providing Phase II service to any requesting Phase II-capable PSAP in its service territory. Estimated deployment dates for pending Phase II requests are provided in the chart enclosed as Attachment B.

**C. Status of Coordination Efforts With PSAPs for Alternative Handset Penetration Dates**

SouthernLINC Wireless remains in constant communication with all PSAPs in its territory regarding E-911 services, its ability to provide Phase I and Phase II service, and any problems that may arise that affect service availability. These communications may be written or verbal, and they include information on SouthernLINC Wireless' ability to provide Phase II service to its customers and the degree to which its customers can benefit from Phase II capabilities. SouthernLINC Wireless' 911 services coordinator interacts with the 911 community on a regular basis, including attending meetings where she provides verbal updates on SouthernLINC Wireless' Phase II deployment status. Depending on the nature of the meeting, such information may be provided to all attendees in the form of a general announcement or may be targeted to interested parties

in specific discussions. Since the submission of SouthernLINC Wireless' 1st Quarter 2006 Report,<sup>7</sup> the 911 services coordinator has provided updates at the Georgia 911 Advisory Committee Meeting (March 2, 2006), the Georgia APCO Spring Training Conference (March 14, 2006), and the Mississippi APCO/NENA Annual Conference (May 1, 2006).

As described in its 1st Quarter 2006 Report, SouthernLINC Wireless has undertaken a communications program for Phase II-capable PSAPs in its service territory focusing on the customer handset penetration issue.<sup>8</sup> Specifically, SouthernLINC Wireless is providing these PSAPs with regular updates every two months via U.S. mail on the number of SouthernLINC Wireless customers using location-capable handsets and its progress towards the goal of ninety-five percent penetration of location-capable handsets.

In addition, SouthernLINC Wireless always provides PSAPs with written confirmation of Phase II implementation once all activities, including testing, have been completed. Going forward, these communications will also include information on the number of SouthernLINC Wireless customers using location-capable handsets and its progress towards the ninety-five percent penetration goal. These PSAPs will also receive the regular mail updates described above.

**D. Efforts to Encourage Subscribers to Reflash or Upgrade Handsets**

To communicate with customers about E-911 services and capabilities, SouthernLINC Wireless launched a bill insert communications plan for 2006 to provide

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<sup>7</sup> / SouthernLINC Wireless E911 Phase II Quarterly Report: February 1, 2006, CC Docket No. 94-102, filed February 1, 2006 ("1st Quarter 2006 Report").

<sup>8</sup> / *Id.* at 5.

information to its customers about E-911. The bill message runs twice each quarter. A sample of the language that is being used in the message appearing on customer bills is provided as Attachment C to this report. This bill message is designed to draw customers' attention to the issue of wireless E-911 service – as well as the need for an A-GPS-capable phone – and send them to a dedicated area on the SouthernLINC Wireless website for more details on E-911 services, including the availability of basic, Phase I, and Phase II services across SouthernLINC Wireless' service territory and information on which handset models are location-capable. A link to information on SouthernLINC Wireless' current handset promotions is also featured at this location so that customers can make decisions on handset upgrades, should they choose to do so. This section of the website was launched in early February 2006. In the second quarter, SouthernLINC Wireless also added a message about A-GPS handsets and 911 service to its "on hold" message at its customer support center, providing customers with another avenue from which to learn about the importance of location capabilities in emergency situations.

SouthernLINC Wireless also has a very attractive handset promotion program underway for the second quarter of 2006, which will help to encourage customers to upgrade to new, location-capable handsets. Under this program, most existing customers in good standing can select almost any location-capable handset offered by SouthernLINC Wireless for a buy one/get one free offer if they wish to upgrade their handsets. In addition, at store locations, customers can select one handset priced at \$9.99 and get a second handset at no cost. Finally, as an on-line promotion, SouthernLINC is offering nearly all handsets at half-price to existing customers in good standing who wish to upgrade.



**E. Extent of Subscribers Having Higher-Power, Non-A-GPS Handsets**

Approximately [ ] percent of SouthernLINC Wireless customers currently use high-power handsets which are not location-capable.

**F. Percentage of Customers With Location-Capable Handsets**

Approximately sixty percent of SouthernLINC Wireless customers currently use location-capable handsets.

**G. Status in Achieving Compliance**

Although SouthernLINC Wireless faces numerous challenges in its efforts to achieve ninety-five percent penetration of location-capable handsets among its subscribers, it is committed to achieving full compliance as quickly as possible and has made significant progress towards this goal. As a result of the variety of outreach, promotional, and marketing efforts it has undertaken, SouthernLINC Wireless has succeeded in increasing its level of penetration of location-capable handsets from approximately forty-three percent on October 31, 2005, to approximately sixty percent as of May 1, 2006. SouthernLINC Wireless is now building on these positive results in order to further accelerate customer adoption of location-capable handsets through additional promotional and outreach measures such as those described in Section II. D. above.

SouthernLINC Wireless believes that it will be able to achieve the ninety-five percent penetration level and will continue to put forth substantial effort and resources into doing so. However, SouthernLINC Wireless, despite its best efforts, is not on schedule to achieve this level by the revised deadline of November 3, 2006. Consequently, as set forth in its pending Petition for Reconsideration and Clarification,

SouthernLINC Wireless does not believe that the ten-month extension granted by the Commission provides sufficient time in light of the extraordinary circumstances of its situation.<sup>9</sup>

### **III. CONCLUSION**

As demonstrated above, SouthernLINC Wireless is continuing to put forth substantial effort and resources into migrating as much of its subscriber base as possible to location-capable handsets, and it is committed to achieving full compliance with the Commission's handset penetration requirement as quickly as possible.

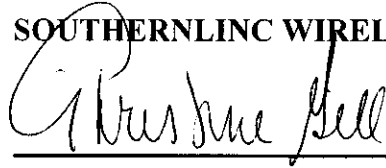
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<sup>9</sup> / Petition at 16 – 18.

REDACTED – FOR PUBLIC INSPECTION

Respectfully submitted,

**SOUTHERNLINC WIRELESS**



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Dated: May 1, 2006